

PAUL HASTINGS

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Via ECF

June 6, 2025

The Honorable John Milton Younge
United States District Judge
Eastern District of Pennsylvania
15613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: *Rushdie-Ahmed v. Trustees of the University of Pennsylvania, et al.*, No. 2:22-cv-05030-JMY

Dear Judge Younge:

Pursuant to the Court's directives during the June 5, 2025 hearing, Defendants Trustees of the University of Pennsylvania, Heather Sharkey, Christina Frei, Paul Cobb, and Jeffrey Kallberg, are filing simultaneously with this letter a set of jointly proposed *voir dire* questions.

The jointly proposed *voir dire* questions include the questions from Defendants' proposed *voir dire* questions filed on June 2, 2025 (ECF No. 66) and all but one of Plaintiff's proposed *voir dire* questions filed on June 4, 2025 (ECF No. 69). The only question the parties were unable to agree upon is Question No. 7 in Plaintiff's proposed *voir dire* questions filed on June 4, 2025. (ECF No. 69.) The question is:

This case may involve an awareness of punitive damages or liquidated damages which are intended to punish particularly wrongful conduct and deter similar behavior in the future. Do any of you have strong feelings, either for or against, awarding money to punish a defendant, even if the law allows it and the facts justify it?

Defendants do not agree that a question about punitive or liquidated damages is appropriate for the reasons set forth in Defendants' Motion *In Limine* No. 4 and argument during the June 5, 2025 hearing. Defendants respectfully request that the Court exclude Question No. 7 above from the *voir dire* questions.

To the extent the Court rules in favor of Plaintiff and includes Question No. 7, Defendants are also submitting a Word version of the jointly proposed *voir dire* questions so they can be amended accordingly.

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Respectfully submitted,

/s/ Jeff Sturgeon

Jeff Sturgeon
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